

KELLEY DRYE & WARREN LPP  
101 Park Avenue  
New York, New York 10178  
(212) 808-7800  
Robert I. Steiner

Attorneys for Creditor  
WACHOVIA BANK, NATIONAL ASSOCIATION

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

In re:	:
	:
Delphi Corporation,	:
	:
Debtor.	:
.....	:
Wachovia Bank, National Association,	:
	1:07-cv-05656-SAS
Appellant,	:
	:
v.	:
	:
Delphi Corporation, <i>et al.</i> ,	:
	:
Appellees.	:

---

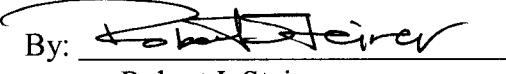
**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Robert I. Steiner, the exhibits thereto, Appellant Wachovia Bank, National Association by its attorneys Kelley Drye & Warren LLP, will move this Court before the Honorable Shira A. Scheindlin, District Judge, at the United States Courthouse, Southern District of New York, Courtroom 15C, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for a Consent Order Staying Appeal and Tolling All Briefing Deadlines.

WHEREFORE, Appellant respectfully requests that the instant Motion be granted in its entirety.

Dated: New York, New York  
June 25, 2007

KELLEY DRYE & WARREN LPP

By: 

Robert I. Steiner  
101 Park Avenue  
New York, New York 10178  
Phone Number: (212) 808-7800  
Fax Number: (212)808-7897

Attorneys for Creditor  
Wachovia Bank, National Association

Neil Berger, Esq.  
Togut Segal & Segal LLP  
One Penn Plaza  
New York, NY 10119  
(212) 594-5000

Attorneys for Debtor  
Delphi Corporation